

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings includes changes to Figs 13 and 14. This sheet, which includes Figs. 13 and 14, replaces the original sheet including Figs. 13 and 14. The following changes have been made to Figs. 13 and 14, the reference numeral 190 has been added.

Attachment: Replacement sheet
 Annotated sheet showing changes

REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated September 29, 2004 has been received and its contents carefully reviewed.

Claims 1-28 are currently pending, wherein claims 1, 3, 9, 14 and 24 have been amended. Applicants respectfully request favorable reconsideration in view of the remarks presented herein below.

On page 2 of the Office Action ("Action"), the Examiner objects to Fig. 13 for failing to comply with 37 CFR 1.84(p)(5) because it does not include reference numeral "190" mentioned in the description. Figs. 13 and 14 have been amended to include reference numeral "190", thereby addressing the Examiner's concern.

The Examiner also objects to the disclosure because paragraph [0068] on page 20 of the disclosure includes repeated text. Paragraph [0068] has been amended to remove the repeated text, thereby addressing the Examiner's concerns.

On page 3 of the Action, the Examiner objects to claims 3, 9, and 24 for various informalities. Claims 3, 9 and 24 have been amended to correct the informalities, thereby addressing the Examiner's concerns.

On page 3, the Examiner also rejects claims 1-7 under 35 U.S.C. §102(a) as allegedly being anticipated by U.S. Patent Application Publication No. 2003/0030768 to Sakamoto et al. ("Sakamoto"). Applicants respectfully traverse this rejection.

In order to support rejection under 35 U.S.C. §102, the applied reference must teach each and every claimed element. In the present case, claims 1-7 are not anticipated by Sakamoto because Sakamoto fails to disclose each and every claimed element as discussed below.

Independent claim 1 defines an array substrate for a transflective liquid crystal display device. As amended, the substrate includes, *inter alia*, a reflective layer covering a common line and a thin film and corresponding to a reflective portion, an insulating layer on the reflective layer, and a transparent electrode formed on the insulating layer and connected to a drain electrode and disposed in the pixel region. Nowhere in Sakamoto there any disclosure of an insulating layer between the reflective layer and the transparent layer as claimed. Accordingly, claim 1 is patentable distinguishable over Sakamoto.

Claims 2-7 variously depend from independent claim 1. Therefore, claims 2-7 are patentably distinguishable over Sakamoto for at least those reasons presented above with respect to claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1-7 under 35 U.S.C. §102.

On page 5 of the Action, the Examiner rejects claim 8 under 35 U.S.C. §103(a) as allegedly being unpatentable over Sakamoto in view of the U.S. Patent Application Publication No. 2003/0058389 to Ha et al. ("Ha"). Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. §103, the Action must establish a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness three criteria must be met. First, there must be some motivation to combine the cited references. Second,

there must be a reasonable expectation of success. Finally, the combination must teach each and every claimed element.

Claim 8 depends from independent claim 1. Therefore, claim 8 is patentably distinguishable over Sakamoto for at least those reasons presented above with respect to claim 1. In addition, Ha fails to overcome the deficiencies of Sakamoto. More specifically, Ha fails to disclose or suggest an insulating layer between the reflective layer and the transparent layer as claimed.

Since Sakamoto and Ha both fail to disclose or suggest a substrate that includes an insulating layer between the reflective layer and the transparent layer as claimed, the combination of these two references cannot possibly disclose or suggest said feature. Therefore, even if one skilled in the art were motivated to combine Sakamoto and Ha as suggested by the Examiner, the combination would still fail to render claim 8 unpatentable for at least the reason that the combination fails to disclose each and every claimed element. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 8 under 35 U.S.C. §103(a).

On page 6 of the Action, the Examiner rejects claims 14 and 16-23 under 35 U.S.C. §103 as allegedly being unpatentable over Sakamoto and Ha, further in view of U.S. Patent No. 6,522,377 to Kim et al. ("Kim"). Applicants respectfully traverse this rejection.

As discussed above, in order to support a rejection under 35 U.S.C. §103, the combination must teach each and every claimed element. In the present case, claims 14 and 16-23 are not rendered unpatentable over the combination of the Sakamoto, Ha and Kim for

at least the reason that the combination fails to disclose each and every claimed element as discussed below.

Independent claim 14 defines a transflective liquid crystal display device. The device includes, *inter alia*, a reflective layer covering the common line and the thin film transistor and corresponding to the reflective portion, an insulating layer on the reflective layer, and a transparent electrode formed on the insulating layer and connected to the drain electrode and disposed in the pixel region. Accordingly, independent claim 14 is patentably distinguishable over the combination of Sakamoto and Ha for at least those reasons presented above with respect to claim 1. In addition, Kim fails to overcome the deficiencies of Sakamoto and Ha.

Since Sakamoto, Ha and Kim each fail to disclose or suggest a device that includes an insulating layer between the reflective layer and the transparent layer as claimed, the combination of these three references cannot possibly disclose or suggest said feature. Therefore, even if one skilled in the art were motivated to combine Sakamoto, Ha and Kim as suggested by the Examiner, the combination would still fail to render claim 14 unpatentable for at least the reason that the combination fails to disclose each and every claimed element.

Claims 16-23 variously depend from independent claim 14. Therefore, claims 16-23 are patentably distinguishable over the combination of Sakamoto, Ha and Kim for at least those reasons presented above with respect to claim 14. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 14 and 16-23 under 35 U.S.C. §103.

The application is in condition for allowance. Notice of same is earnestly solicited. Should the Examiner for any reason find the application other than in condition for

allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: December 29, 2004

Respectfully submitted,


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Attachments

